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1735 Jersey Ave LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

1735 JERSEY AVE LLC,

Plaintiff,

v.

LUXE LIVING DESIGN, LLC,

Defendants.

**HON. MICHAEL A. SHIPP, U.S.D.J.,
HON. TONIANNE J.
BONGIOVANNI, U.S.M.J.**

**CIVIL ACTION NO. 3:24-cv-06175
(MAS) (TJB)**

Return Date: June 17, 2024

NOTICE OF MOTION

TO: Avram E. Frisch, Esq.
Law Office of Avram E. Frisch LLC
1 University Plaza, Suite 119
Hackensack, NJ 07601
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PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, Certification of Jonathan A. Ozarow, Esq. dated May 24, 2024 with attached exhibits, Certification of Joseph Saadia with attached exhibits, and all prior papers and proceedings heretofore had herein, Plaintiff, 1735 Jersey Ave LLC, by its attorneys Clark Guldin Attorneys at Law, will move before U.S. District Judge

Michael A. Shipp, Clarkson S. Fisher Building & US Courthouse, 402 East State Street Room 2020, Trenton, NJ, Courtroom 5W, on June 17, 2024, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order (i) remanding this action to the Superior Court of New Jersey, Special Civil Part, Landlord Tenant Division, (ii) awarding Plaintiff its cost and attorneys' fees incurred in connection with the instant motion, pursuant to 28 U.S.C. §1447(c); and (iii) awarding such other relief as the Court deems just and proper.

Dated: May 24, 2024

CLARK GULDIN
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By: 

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